

# **Michelle Dresbold**

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January 19, 2024

John R. Kane, Esquire  
SAVINIS, KANE, & GALLUCCI, L.L.C.  
436 Seventh Ave, Ste 700 Koppers Bldg.  
Pittsburgh, PA 15219

## **Re: Questioned Renee Zinsky Signatures**

I have been retained by SAVINIS, KANE, & GALLUCCI, L.L.C. to determine the validity of questioned, "Renee Zinsky" signatures on a Pre-Contracting Acknowledgement and Certificate Document dated 2/13/2019.

### **Qualifications**

For more than twenty years, I have provided forensic handwriting analysis and document examination services to a wide range of clients. Those clients include federal and state agencies, such as the Space and Naval Warfare System Command, the U.S. Postal Service's Office of Postal Inspection, and the District Attorney's Office for Allegheny County Pennsylvania. I have also provided forensic handwriting and document examination services to both the Democratic Committee and Republican Party of Pennsylvania, the Election Board for Allegheny County, as well as a number of corporations operating across the country.

I have a broad background in the study of forensic handwriting analysis and document examination. I was selected to attend the United States Secret Service Document Training Program and I was one of only nineteen people invited to attend the United States Secret Service Advance Document Training Program. A list of my qualifications is included in my curriculum vitae attached as Exhibit A

As a handwriting expert and document examiner, I have been qualified to provide, and have provided, opinion testimony in a variety of matters ranging from kidnapping cases to election cases.

I have also given presentations and written articles addressing handwriting and document examination.

My compensation is not contingent on the outcome of any litigation dispute.

### **Questions Addressed in This Expert Report**

I have been engaged to opine on the following:

Were the “Renee Zinsky” signatures appearing on a Pre-Contracting Acknowledgement and Certificate Document dated 2/13/2019 authored by Renee Zinsky?

### **Material Reviewed**

In forming the opinions in this report, I considered the following materials:

- **The following exemplars (Known Writing) of Renee Zinsky:**

K1: American Income Life Insurance Document with Known Signature of Renee Zinsky dated, 9/30/19.

K2: American Income Life Insurance Document with Known Signature of Renee Zinsky dated, 7/24/19.

K3: American Income Life Insurance Document with Known Signature of Renee Zinsky dated, 8/13/2020.

- K4: American Income Life Insurance Document with Known Signature of Renee Zinsky dated, 7/2/2020.
- K5: American Income Life Insurance Document with Known Signature of Renee Zinsky dated, 6/29/2020.
- K6: American Income Life Insurance Document with Known Signature of Renee Zinsky dated, 6/26/2020.
- K7: American Income Life Insurance Document with Known Signature of Renee Zinsky dated, 6/6/2020.
- K8: American Income Life Insurance Document with Known Signature of Renee Zinsky dated, 1/27/2020.
- K9: American Income Life Insurance Document with Known Signature of Renee Zinsky dated, 1/8/2020.
- K10: American Income Life Insurance Document with Known Signature of Renee Zinsky dated 1/6/ 2020.
- K11: American Income Life Insurance Document with Known Signature of Renee Zinsky dated, 10/15/19.
- K12: American Income Life Insurance Document with Known Signature of Renee Zinsky dated, 10/15/19.
- K13: American Income Life Insurance Document with Known Signature of Renee Zinsky dated, 9.29.19.
- K14: American Income Life Insurance Document with Known Signature of Renee Zinsky dated, 9.10.19
- K15: American Income Life Insurance Document with Known Signature of Renee Zinsky dated, 9.10.19.
- K16: American Income Life Insurance Document with Known Signature of Renee Zinsky dated, 9.12.19.



K17: Note from Cheryl Meyer with Known Signature of Renee Zinsky dated, 5.31.19.

K18: Check # 115 with Known Signature of Renee Zinsky dated, 12.5.23.

K19: Check # 116 with Known Signature of Renee Zinsky dated, 1.1.24.

**The following document with Questioned, “Renee Zinsky” Signatures:**

Q1: Questioned “Renee Zinsky” signature, Page 1, on a Pre-Contracting Acknowledgement and Certificate Document dated 2/13/2019.

Q2: Questioned “Renee Zinsky” signature, Page 6, on a Pre-Contracting Acknowledgement and Certificate Document dated 2/13/2019.

Q3: Questioned “Renee Zinsky” signature, Page 9, on a Pre-Contracting Acknowledgement and Certificate Document dated 2/13/2019.

Q4: Questioned “Renee Zinsky” signature, Page 10, on a Pre-Contracting Acknowledgement and Certificate Document dated 2/13/2019.

**Examination Conducted**

The task of examining and comparing writings can generally be organized into three phases:

1. “The first step is to examine the standard or known writings to ensure that they are what they were purported to be, that they are legible and suitable for comparison purposes, and that they are useful as a means of becoming familiar with the characteristics in the attested writings.”
2. “The second step is to examine the questioned documents to determine whether they are of a quality to allow valid comparison and to discover evidence other than the handwriting that could contribute to the proof of authenticity or nongenuineness.”

3. “The third step is to compare all aspects of the questioned writing with the characteristics in the known writings to reach an opinion regarding authenticity.”

(Fundamentals of Document Examination, Edna W. Robertson page 65).

I have reviewed the Known Signatures (K1-K19) of Renee Zinsky:

The original documents in question were not available for review. Therefore, the examination and comparison conducted in this matter were conducted from digitized copies. The digitized known copies are clear and of a quality to allow for a valid comparison.

The known standards were compared among themselves and were determined that they have all been written by the same person.

In the known standards of Renee Zinsky, her signature has natural variation, however it is consistent throughout the documents.

I have reviewed the Questioned “Renee Zinsky” Signatures (Q1-Q4):

The Questioned (Q1-Q4), “Renee Zinsky” signatures on the copy of the Pre-Contracting Acknowledgement and Certificate Document dated 2/13/2019 is clear and of a quality to allow for a valid comparison.

The corresponding questioned and known writings received for analysis were studied side-by-side and compared to weigh their identifying qualities.

### **Methodology**

This report is the product of the application of reliable principles and methods commonly used in the field of forensic handwriting and document examination. Finally, in arriving at my conclusions, I applied the reliable principles and methods to the Q1-Q4 questioned signatures in dispute as they relate to the Known K1-K19 documents based on my training and 20+ years’ experience.

The principal part of any comparison is the discovery, identification, and evaluation of the writers' habits that occur in the movement and structure of the writings. Fundamentals of Document Examination, Edna W. Robertson at p. 66 ("The practical study of handwriting is concerned with the recorded motion that laid the writing down on paper. Although the lines and forms that make up the writing are the concrete evidence of that motion, the motion actually began before the pen touched the paper.").

Writing formation is often characterized by a group of specific elements. Elements to be compared that define writing similarities include, but are not limited to, the following:

1. The design of letters, numbers, and symbols and their slant.
2. The relative size of capital letters and lower-case letters.
3. The relative size of letter projections below or above the baseline.
4. The relative size of letters projecting above or below the height of the others.
5. Ornaments and flourishes.
6. Simplification of letter and number formations.
7. The arrangement of different parts of the writing, the balance of the writing, or the pattern of writing.
8. Smoothly rounded, sharply curving or elliptical or angular connecting strokes between letters and in turns of letters.
9. Continuous writing movement or interruption of movement at certain intervals.
10. Punctuation, numbers, markings and symbols.

(United States Secret Service Office of Training Manual, Section D (Qualities And Features of Handwriting)).

### **Opinions And Conclusion**

Standard Terminology for Expressing Conclusions of Forensic Document Examiners by the American Academy of Forensic Science as cited in the Advanced



Questioned Document Training Program Manual is a nine-point conclusion scale:

1. Elimination-highest degree writer did not write.
2. Strong Probability the writer did not write.
3. Probably the writer did not write.
4. Indications the writer did not write.
5. No conclusion (Inconclusion).
6. Indications (evidence the writer did write).
7. Probably the writer wrote.
8. Strong probability the writer wrote.
9. Identification-highest degree the writer wrote.

The Questioned (Q1-4), “Renee Zinsky” signatures on the Pre-Contracting Acknowledgement and Certificate Document dated 2/13/2019 are in agreement with each other and were authored by one individual.

In the Pre-Contracting Acknowledgement and Certificate Document dated 2/13/2019 with the Questioned (Q1-Q4) “Renee Zinsky” signatures, it can be determined that: The design of letters, and their slant, the relative size of capital letters and lower-case letters, the relative size of letter projections below or above the baseline, the relative size of letters projecting above or below the height of the others, ornaments and flourishes, simplification of letter formations, pattern of writing, smoothly rounded, sharply curving or elliptical or angular connecting strokes between letters and in turns of letters, continuous writing movement or interruption of movement at certain intervals are NOT in agreement in terms of writing similarities with the known (K1-K19) signatures of Renee Zinsky.

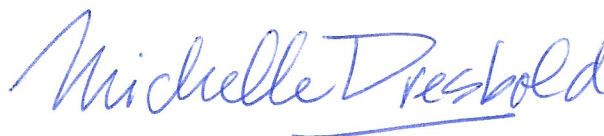
Based on my review of the known samples (K1-K19) as compared to the Questioned signatures, it is my opinion, within a reasonably degree of professional certainty in the field of forensic handwriting analysis that:

The “Renee Zinsky” signatures (Q1-Q4) on the Pre-Contracting Acknowledgement and Certificate Document dated 2/13/2019 were NOT

authored by Renee Zinsky– a finding consistent with Level 1 “Elimination,”  
i.e., the-highest degree of certainty that the subject did not write.

If desired, I can provide an illustrated chart of my findings.

Sincerely,

A handwritten signature in blue ink that reads "Michelle Dresbold". The signature is written in a cursive style with a prominent underline at the end of the last name.

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Michelle Dresbold



## **MICHELLE DRESBOLD**

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### **EDUCATION**

- 2005 The School of Forensic Document Examination, Dallas Texas—Training Conference
- 2000 Federal Law Enforcement Training Center, Glynco, Georgia – United States Secret Service, Advanced Questioned Document Training Course
- 1998 Federal Law Enforcement Training Center, Glynco, Georgia – United States Secret Service, Questioned Document Training Course
- 1991 American Handwriting Association - Handwriting Seminar
- 1990 Community College of Allegheny County - Advanced Handwriting Analysis
- 1989 Community College of Allegheny County - Handwriting Analysis
- 1977 University of Michigan, Ann Arbor, Michigan - Bachelor of Fine Arts

### **REPRESENTATIVE CASES**

- 2023 Expert Witness in civil case before Honorable John T. McVay, Jr., concerning multiple disputed signatures, including witnesses and notary on Power of Attorney.
- 2021 Expert Witness in Circuit Court of Preston County, West Virginia, Civil Action NO. 18- C-55, Jury trial before Honorable Steven L. Shaffer
- 2021 Expert Witness in the Court of Common Pleas of Philadelphia County, First Judicial District of Pennsylvania, in disputed deed contract, before Judge Sierra Streets
- 2020 Expert Witness in civil case before Judge Dr. S. Michael Yeager, Butler, PA
- 2019.....Expert Witness in civil case before Judge Patrick M. Connelly, Allegheny County, PA
- 2018 Expert Witness in civil case before Judge Luty, Allegheny County, PA
- 2017 Expert Witness in disputed non-compete agreement, Tri-State Paper Company v. Boesenhofer et al., Philadelphia, PA
- 2017 Expert witness in arbitration case concerning authenticity of scanned signature on contract, (Cintas v. Potoka), Westmorland County, PA).

- 2017 Expert witness in election case for David L. Criss, Republican Candidate for sheriff, Washington County, Commonwealth court of Pennsylvania
- 2016 Expert witness in election case for Jerry Carnicella, Democratic Candidate for Representative in the General Assembly from the 35<sup>th</sup> Legislative District, Allegheny County, Commonwealth court of Pennsylvania
- 2016 Expert witness in election case No. 120 M.D. 2016, in re: Valian Fawn Walker-Montgomery, Republican Candidate for Representative in the General Assembly from the 35<sup>th</sup> Legislative District, Allegheny County, Commonwealth court of Pennsylvania
- 2015 Expert witness concerning anonymous writing on house, Allegheny County, Pennsylvania
- 2015: Expert witness in the Circuit Court of Monongalia County, West Virginia, Division No. 2, State of West Virginia vs Bruce Maxwell, Defendant, Felony No. 15-F-52
- 2013 Expert Witness for defense in Federal Court before Judge Joy Conti, USA vs. Lewis Whoolery-2:10-cr-00144
- 2012 Expert witness for Republican Party in election case before Judge Collins in Philadelphia, PA Commonwealth Court of Pennsylvania, case number 507 M. D. 2012
- Expert witness in election case before Judge Pelligrini in Allegheny PA, Commonwealth court of Pennsylvania
- Expert witness in election case before Judge Patricia McCullough in Allegheny PA, Commonwealth court of Pennsylvania, 128 M.D. 212
- 2011 Expert witness in a civil case before The Honorable Richard E. McCormick, Jr. in Westmorland County, PA concerning disputed signatures on promissory note.
- 2009 Expert witness for defense in a criminal case before Judge Randal Todd in Allegheny County, PA. Following my testimony, Judge Todd dismissed all criminal charges against the defendant.
- 2008 Expert witness in a medical malpractice case before Judge Eugene Scanlon, Jr. in Allegheny County, PA concerning altered documents.
- 2007 Expert witness in civil case before Judge Judith Friedman in Allegheny County, PA, concerning disputed signatures on a survivor benefit election form.

- 2006 Expert witness in civil case before Judge Robert Horgos, in Allegheny County, PA, concerning disputed signatures on a deed.  
Expert witness in civil case before Judge Timothy Patrick O'Reilly, in Allegheny County, PA, concerning disputed signatures on open-end mortgage.
- 2004 Expert witness for defense before Judge Zottola in Allegheny County, PA, concerning bank robbery case. Jury returned not guilty verdict on all counts.
- 2003 Expert witness for D.A. before Judge Robert Colville in Allegheny County, PA concerning altered document in attempted kidnapping case. Jury returned guilty verdict on all counts.
- Expert witness before Judge Judith Friedman in Allegheny County, PA concerning disputed signature on promissory note.
- Expert witness before Judge Martin O'Brien in Butler County, PA, concerning disputed signature on contract.
- Expert witness before Judge Kelley in Fayette County, PA, concerning disputed signatures on election board petition.
- 2002 Testified for D.A. before Judge O'Toole, Allegheny County, PA, in arson/murder trial on handwriting and writing stylistics. Jury returned guilty verdict on all counts.
- Expert witness for D.A. before Judge Emery, Washington County, PA, concerning anonymous threat notes. Jury returned guilty verdict on all counts.
- Expert witness for defense before Judge Machen, Allegheny County, PA, concerning handwriting on credit card application.
- Expert witness before Judge Little in Allegheny County, PA, Pennsylvania Orphans' Court, concerning alleged forged signatures on various documents.
- 2001 Expert witness before Judge James Wagner, Fayette County, PA. Testified in court concerning signature on agreement of sale.
- Expert witness before Judge Penkower, Allegheny County, PA, concerning signature on property lease agreement.
- 2000 Expert witness for defense concerning an anonymous letter in a criminal trial before Judge Ralph Warman, in Fayette County, PA, which resulted in a not-guilty verdict.



Expert witness, appointed by the court, before David Korman, in Allegheny County, PA, Family Court Division, concerning dates of signatures.

Expert witness before Judge Machen, Allegheny County, PA, concerning anonymous threat notes.

Expert witness before Judge Juliante, Erie County, PA, concerning numerous forgeries on election board petition.

- 1999     Witness before Judge Folino in Allegheny County, PA, concerning a questioned signature on a loan agreement.

Testified for D.A. at criminal trial before Judge Ross in Allegheny County, PA, concerning anonymous letters written by stalker.

- 1998     Witness before Judge Little in Allegheny County, PA, Pennsylvania Orphans' Court concerning authenticity of signature on a challenged will.

Expert witness for defense concerning an alleged forged signature on a will in a criminal trial before Judge Martin O'Brien in Butler County, PA, which resulted in a not guilty jury verdict on all counts.

Expert witness before Judge Manning in Allegheny County, PA, against homicide suspect who wrote incriminating letter. The jury returned third degree murder conviction.

- 1997     Expert witness before Judge Mazur in Allegheny County, PA, concerning questioned signature.

Expert witness before Judge McLean in the Allegheny County, PA. Testified in court to prove that there were a number of forgeries among the 16,797 signatures asking for a police review board referendum.

## **OTHER JUDICIAL FORUMS**

I have appeared as an expert handwriting examiner in: Federal Court; Commonwealth Court of Pennsylvania; Register of Wills' hearings; coroner's inquests; Pennsylvania Department of Public Welfare hearings; and at district justice, unemployment compensation, child support, election commission, and arbitration hearings.

## REPORTED JUDICIAL COMMENTS

“The Court found Dresbold’s testimony to be clear, well founded, convincing, and credible.”

Englert v. Funk, 151 Pittsburgh Legal Journal 77, 78 (Pa. C.P. Alleg. Co. 2003) (Judge Penkower).

“Comparing the testimony elicited by these two experts, we believe that Ms. Dresbold presented substantial evidence to support Appellant’s claim that the signature of Mr. McNish was improper.”

In re Nomination of Flaherty, 770 A.2d 327, 335 (Pa. 2001) (Justice Nigro).

## REPRESENTATIVE CLIENTS

Office of the District Attorney of Allegheny County; The Space and Naval Warfare Systems Command; Pittsburgh Police Department; Pennsylvania State Police; Commonwealth of Pennsylvania Department of Public Welfare; U.S. Postal Service Office of Postal Inspection; Allegheny County Police Department; Franklin Park, PA Police Department; Democratic Committee of Pennsylvania; Republican Party of Pennsylvania, Allegheny County Election Board; Buchanan Ingersoll; Reed, Smith, Shaw & McClay; Tucker Arensberg; Thorp Reed & Armstrong; Pietragallo, Bosick & Gordon; Marcus & Shapira; Bayer USA; Alcoa; Union Switch & Signal; UPMC; Westco; Scott Mears, Inc.; Giant Eagle Corporation; Schwan’s; State Farm Insurance Co.; Pittsburgh Fraternal Order of Police

## REPRESENTATIVE LECTURES AND ARTICLES

- 2018....Assistant Instructor, Cold Case Club, University of Pittsburgh
- 2015 Featured Article, Politico Magazine, The Candidates and their Handwriting
- 2015 Instructor, Osher Program, University of Pittsburgh, Pittsburgh, PA. You Don’t Say: The Science of Handwriting, Statement Analysis, and Body Language
- 2012 Instructor, Osher Program, University of Pittsburgh, Pittsburgh, PA. Handwriting and Statement Analysis
- 2011 Featured Article, Spring 2011 Forensic Law, ATLADOCKET, Publication of the Arkansas Trial Lawyers Association: Busted by a Handwriting Detective
- 2011 Featured Article, July/August 2011 Trial News, Washington State Association for Justice: Busted by a Handwriting Detective
- 2011 Featured Article, November 2011 Idaho Trial Lawyers Association Journal, Document Examination
- 2009 Instructor, University of Pittsburgh, Pittsburgh, PA. Handwriting and Criminology
- 2007 Featured Presenter, U.S. Department of Justice, Pittsburgh, PA: Communication and Deception
- 2007 Recipient of the Faith Weinstein Author and Book Award, Pittsburgh, PA: The True Identity of Jack the Ripper
- 2007 Featured Presenter, The Mayflower Society, Pittsburgh, PA
- 2006 Lecturer, Wecht Institute of Law & Forensics, Duquesne University, Pittsburgh, PA

- 2003    Featured Presenter, National Conference of the American College of Forensic Examiners International
- 2000    Pittsburgh Police Detective Bureau, Pittsburgh, PA: Conducting Handwriting Investigations
- 1999    Criminology Department, LaRoche College, Pittsburgh, PA: Questioned Documents
- 1998    Vanguard Conference for Handwriting Professionals, Los Angeles, CA: How the Police Use Handwriting Experts